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Attorney for Defendant Richard Tom
(Seeking Leave to Withdraw)

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**MARK NG, LORRAINE WONG
AND KENDALL NG, an individual;**

Case No. 19-31024 HLB

Chapter 7

A.P. No. 19-03065 HLB

RICHARD TOM

STIPULATION FOR WITHDRAWAL (OR SUBSTITUTION) OF COUNSEL

Defendant

Judge: Hon. Hannah L. Blumenstiel

Attorney Jeffrey B. Neustadt (including the Law Offices of Jeffrey B. Neustadt) and Defendant Richard Tom hereby AGREE and STIPULATE as follows:

For reasons they cannot disclose publicly, but which do include significant differences of opinion as to how this case should be defended and otherwise handled, Attorney and Defendant wish to terminate and to end immediately Attorney's designation as Defendant's attorney of record in this case. Whether that termination is granted by way of this stipulation, upon a motion, by *ex parte* application, or any other means or combination thereof, Attorney Jeffrey B. Neustadt and

1 Defendant Richard Tom jointly request that the Court order and decree that Richard Tom is and
2 shall be until further notice self-represented in this case.

3 Richard Tom agrees to accept service of all materials, pleadings, and notices in this case
4 electronically:

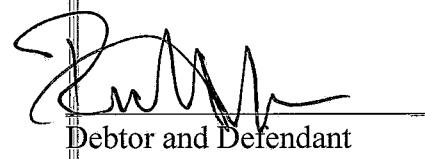
5 Richard Tom, Defendant *In Pro Per*

6 536 Green St., #2, San Francisco, CA 94133, 415-8859080

7 rtom536@yahoo.com and richtom239@yahoo.com.

8 As Defendant must file his Opposition to the pending Summary Adjudication motion by
9 June 30, 2022, the designation of Jeffrey B. Neustadt as Defendant's counsel of record in this case
10 is complicating and delaying preparation of that Opposition. The retention and designation of
11 Jeffrey B. Neustadt as counsel for Defendant Richard Tom in this case was not to delay or to
12 prejudice the Court, opposing counsel, or any party hereto; it was done in good faith, but
13 ultimately in error.

14 Date: June 9, 2022



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Debtor and Defendant
Richard Tom

20 Date: June , 2022

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Jeffrey B. Neustadt /s/
Jeffrey B. Neustadt
Counsel for Debtor and Defendant
Richard Tom
(Counsel Seeking to Withdraw)